

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:22-cr-00084-SI**

**v.**

**[PROPOSED] PROTECTIVE ORDER  
AS TO PARTICULAR DISCOVERY**

**TONY DANIEL KLEIN,**

**Defendant.**

Upon motion of the United States, this Court being advised as to the nature of this case and the sensitive law enforcement material contained within Volume 9 of discovery and any subsequent production related to the same subject matter, it is hereby:

ORDERED that pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, counsel for defendant shall not provide defendant with copies of any of the above-referenced discovery material,

IT IS FURTHER ORDERED that defendant is allowed to view the discovery under the active, in-person supervision of defense counsel—that is, the discovery will be under the custody and control of defense counsel during defendant’s review.

IT IS FURTHER ORDERED that neither defense counsel nor defendant shall provide any of this discovery material produced by the government, whether the material is redacted, to any person not a party to this case without the government’s express written permission, except that defense counsel may provide discovery material, whether it is redacted, to members of the

defense team and to those persons who are necessary to assist counsel in preparation for trial or other proceedings.

IT IS FURTHER ORDERED that while defendant is allowed to view discovery, defendant shall not print or make copies, digital or otherwise, of such information.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE MICHAEL H. SIMON  
United States District Judge